

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION,  
OPIATE LITIGATION**

**MDL NO. 2804**

**Case No. 17-MD-2804**

**THIS DOCUMENT RELATES TO:**

**Judge Dan Aaron Polster**

*Rees v. McKesson Corporation, et al.*  
S.D. IL, C.A. #18-00511; MDL Case #1:18-OP-45252

*Wood v. Purdue Pharma L.P., et al*  
E.D. MO, C.A. #18-00385; MDL Case #1:18-OP-45264

*Salmons v. Purdue Pharma L.P., et al*  
S.D. WV, C.A. #18-00385; MDL Case #1:18-OP-45268;

*Ambrosio v. Purdue Pharma L.P., et al*  
C.D. CA, C.A. #18-02201; MDL Case #1:18-OP-45375

*Flanagan v. Purdue Pharma L.P., et al*  
W.D. TN, C.A. #18-02194; MDL Case #1:18-OP-45405

*Whitley, et al. v. Purdue Pharma L.P., et al*  
W.D. TN, C.A. #18-02290; MDL Case #1:18-OP-45598

*Roach v. McKesson Corporation, et al.*  
E.D. LA, C.A. #18-04165; Transferred by CTO-27; awaiting MDL Case No.

*Hunt v. Purdue Pharma L.P., et al*  
D. MD, C.A. #18-01349; Transferred by CTO-32; awaiting MDL Case No.

**MOTION FOR LEAVE TO FILE MOTION FOR ORDER  
TO ESTABLISH SEPARATE TRACK FOR OPIOID BABY CLAIMS**

Plaintiffs respectfully move for leave to file a motion for the creation of a separate, limited  
“Opioid Baby” track.

The undersigned was afforded the opportunity to discuss the creation of this track at the  
Court’s May 10, 2018 Status Conference. The proposed motion builds on this discussion and

formally requests the creation of this limited, separate track. The proposed motion and supporting memorandum are attached. Case Management Order #1, which precludes the filing of Motions before the Court by any party or lawyer other than those appointed, necessitates this request for leave.

For all of these reasons, Plaintiffs pray that their motion is granted.

Respectfully submitted,

/s/ Scott R. Bickford

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 31st day of May, 2018, a copy of the above and foregoing has been electronically filed with the Clerk of Court using the CM/ECF system, which provides an electronic service notification to all counsel of record registered as CM/ECF users.

/s/SCOTT R. BICKFORD